

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

HDR GLOBAL TRADING LIMITED,
ABS GLOBAL TRADING LIMITED,
ARTHUR HAYES, BEN DELO, and
SAMUEL REED,

Defendants.

Case No. 1:20-cv-02805-ALC

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD

Pursuant to Civil Rule 1.4 of the Local Rules of the United States Court for the Southern District of New York, the undersigned counsel, Sarah B. Zimmer, respectfully requests leave to withdraw as counsel of record for defendant Ben Delo.

1. The plaintiffs instituted this action against Mr. Delo on April 3, 2020 (ECF No. 1).
2. The parties are awaiting the Court's ruling on certain issues including defendants' request to coordinate *Williams and Messieh v. HDR Global Trading Ltd. et al.* (20-cv-3232), as well as plaintiffs' request for a pre-motion conference concerning the filing of their proposed amended complaints in both actions.

3. Local Civil Rule 1.4 states:

An attorney who has appeared as attorney of record for a party may be relieved or displaced only by order of the Court and may not withdraw from the case without leave of the Court granted by order. Such an order may be granted only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement and the posture of the case, including its position, if any, on the calendar, and whether or not the attorney is asserting a retaining or charging lien.

All applications to withdraw must be served upon the client and (unless excused by the Court) upon all other parties.

4. As of December 23, 2020, the undersigned counsel will no longer be associated with Smith Villazor LLP (“Smith Villazor”).

5. Counsel of record Patrick J. Smith of Smith Villazor will continue to act as counsel for Mr. Delo in this matter.

6. No retaining or charging lien is being asserted.

For the reasons set forth herein, the undersigned counsel respectfully requests that the Court grant the Motion for Leave to Withdraw as Counsel of Record for Mr. Delo.

Respectfully submitted,

Dated: December 22, 2020

/s/ Sarah B. Zimmer
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Attorneys for Defendant Ben Delo